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National Specialty Pharmacy, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NATIONAL SPECIALTY PHARMACY,)
LLC)

Plaintiff,

vs.

SAMEER PADHYE, an individual,
BENJAMIN D. BROWN, an
individual, and DOES 1 to 49,
inclusive,

Defendants.

) Case No. 5:23-cv-04357-NW

) **OBJECTION AND**
) **DECLARATION OF SANJIV**
) **DHAWAN TO ORDER TO SHOW**
) **CAUSE**

1 I, Sanjiv Dhawan, declare as follows:

2 1. I am an attorney licensed to practice in the State of California, and the manager of
3 Plaintiff National Specialty Pharmacy LLC (“NSP”) in this action. I have personal knowledge of
4 the facts stated herein and could and would competently testify to the same if called as a witness.

5 2. I object to the Court’s July 30, 2025 Order to Show Cause (Dkt. No. 139) for the
6 reasons set forth below.

7 3. I have been suffering from hypertension for over 10 years.

8 4. Over the past five years it has become more acute requiring me to take six
9 different medications, Atorvastatin, Irbesartan, Amlodipine, Diltiazem, Hydrochlorothiazide and
10 Irbesartan, daily.

11 5. Among the symptoms and effects of elevated blood pressure are dizziness, severe
12 headaches, difficulty in walking at times and shortness of breath.

13 6. Many of these symptoms are brought on by stress.

14 7. I have been under the care of my cardiologist, Dr. Rohit Sehgal.

15 8. On the morning of July 29, 2025, my blood pressure measured at 160 over 107—
16 amounting to stage 2 hypertension

17 9. I exhibited pronounced symptoms of a severe headache, dizziness, and difficulty
18 in walking despite taking my prescribed medications.

19 10. Any added stress that morning could have had serious consequences for me,
20 especially during a two-hour drive from my home in Tiburon to court in San Jose.

21 11. These symptoms have occurred in the past and have required me to rest until they
22 resolved. Added stress elevates my blood pressure to dangerous levels risking heart attack or
23 stroke.

24 12. My blood pressure and the symptoms can only be controlled by my medications
25 and rest when required.

26 13. Accordingly, I could not physically be present in court the morning of July 29,
27 2025.

28 14. I suffer from hypertension for which my cardiologist, Dr. Rohit Sehgal, first began


1 treating me on January 29, 2024. When I suffer from blood pressure spikes as I exhibited on the
2 morning of July 29, 2025, the recommended course of action for me is to lay down, rest, and
3 avoid action or conduct that may cause stress.

4 15. On the morning of July 29, 2025 I attempted to call in to the Court, and appear by
5 Zoom, as instructed by the Court, but could not due to technical issues with the Zoom application
6 on my laptop computer.

7 16. Given the above, I respectfully request that the Court not impose monetary or other
8 sanctions for my failure to appear for the July 29, 2025 hearing.

9 I declare under penalty of perjury under the laws of the United States that the foregoing is
10 true and correct.

11
12 Dated: August 4, 2025



Sanjiv Dhawan